

October 20, 2010

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



Re: Notice of *Ex Parte* Presentation
MM Docket No. 99-25 (Creation of Low Power Radio Service)

Dear Ms. Dortch:

On Tuesday, October 19, 2010, Brian Gantman and David Oxenford, representing Educational Media Foundation ("EMF"), and Pete Tridish and Matt Wood, representing Prometheus Radio Project ("Prometheus"), met to discuss matters in the above-captioned docket with William T. Lake, Media Bureau Chief; Peter Doyle, Division Chief in the Media Bureau's Audio Division; and James Bradshaw, Audio Division Deputy Division Chief.

In the meeting, the EMF and Prometheus participants discussed the revised version of their Memorandum of Agreement Regarding LPFM/FM Translator Priorities (the "MOA") filed in the docket on September 22, 2010. The Prometheus participants also discussed the study prepared by the advocacy organization Common Frequency, which likewise was filed in the docket under separate cover on September 28, 2010. Finally, the EMF and Prometheus participants noted briefly their ongoing review of the proposal submitted by Twenty-One Commercial Radio Broadcasters on October 7, 2010, and discussed the potential timeframe for implementation of the various proposals.

The Prometheus participants explained that the Common Frequency study suggests the detrimental impact on LPFM opportunities in most metropolitan areas that could be expected under the previously proposed cap and parameters for processing translator applications. That cap also could result unintentionally in rural populations and other underserved areas not receiving radio service if and when applicants chose to forgo protection of applications in such areas.

EMF and Prometheus also described their ongoing efforts to engage in dialogue on these issues with other interested parties and such parties' representatives, seeking as always to promote policies that would strike a fair balance between LPFM and translator applicants' opportunities now and in future windows. The EMF and Prometheus participants highlighted and discussed briefly the revised proposals in the MOA designed to promote local service and diversity of voices in local markets, as well as common-sense safeguards suggested in the MOA to ensure auction integrity and to curb speculative behavior after disposition of the pending translator applications.

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We submit this letter today pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact us should you have any questions regarding this submission.

Respectfully submitted,

/s/ Matthew F. Wood

Associate Director
Media Access Project
Counsel to Prometheus Radio Project

cc: William T. Lake
Peter Doyle
James Bradshaw